

EXHIBIT “A”

Apr 07 2017 15:21 Anita Typing Service LLC 973-228-2442

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Rx Date/Time MAR-28-2017 14:49

973

SUPERIOR COURT

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JOHN J. SHEPTOCK, LLC - N.J. Attorney I.D. No. 007611988
2424 Morris Avenue, Suite 302
Union, NJ 07083
(908) 686-9800
Attorney for Plaintiff
File Number: 8788

LAW DIVISION
ESSEX VICINAGE

MAR 15 2017

FINANCE DIVISION
RECEIVED/FILED

ULVICHE NGAYINO,

Plaintiffs,

vs.

WILLIAM PAUL, QUALITY CARRIERS,
and JOHN DOE,

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: ESSEX COUNTY

DOCKET NO.: ESX-L-1969-17

CIVIL ACTION

COMPLAINT
AND JURY DEMAND

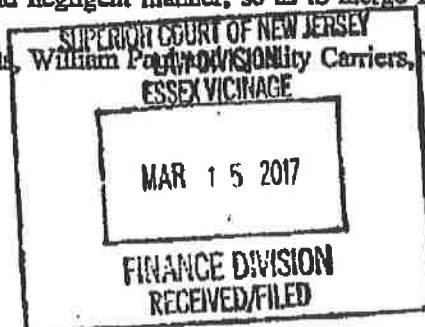
Plaintiff, Ulviche Ngayino, residing at 10 Osbourne Terrace, Apt. 6G, Newark, New Jersey, by way of Complaint against the defendants, asserts the following:

FIRST COUNT

1. On or about June 25, 2015, plaintiff, Ulviche Ngayino, was the operator a motor vehicle during the scope of his employment with Pegasus Transport Services, which was traveling north on Route 17 in Paramus, New Jersey.

2. At or about the aforesaid time and place, defendant, William Paul, was the operator of a motor vehicle, which was owned by defendant, Quality Carriers, which was traveling north on Route 17 in Paramus, New Jersey.

3. Defendants, William Paul and Quality Carriers, operated, controlled and maintained their vehicle in a careless, reckless and negligent manner, so as to merge into the plaintiff's lane, striking his vehicle, and, defendants, William Paul and Quality Carriers, were in many other diverse and sundry ways, negligent.



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4. As a direct and proximate result of the negligence of the defendants, the plaintiff was caused to suffer and sustain great pain of mind and body, was forced to undergo much medical treatment, did sustain a permanent injury that has not healed and will not heal to function normally, did sustain a loss of time, livelihood and ability to carry out his normal duties and activities for a long period of time and he will endure the same in the future.

WHEREFORE, plaintiff, Ulviche Ngayino, hereby demands judgment against the defendants, William Paul and Quality Carriers, for compensatory damages, attorney's fees, interest, and costs of suit.

SECOND COUNT- (JOHN DOE)

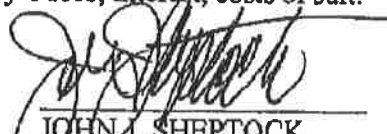
1. Plaintiff repeats and reiterates each and every allegation contained in the First Count, as if set forth more fully at length herein.

2. Defendant, John Doe, upon information and belief is the owner and/or operator and/or individual who in some way contributed to the happening of the aforesaid accident and the defendant, John Doe, was in many other diverse and sundry ways, negligent.

3. As a direct and proximate result of the negligence of the defendant, John Doe, the plaintiff was caused to suffer and sustain great pain of mind and body, was forced to undergo much medical treatment, did sustain a permanent injury that has not healed and will not heal to function normally, did sustain a loss of time, livelihood and ability to carry out his normal duties and activities for a long period of time and he will endure the same in the future.

WHEREFORE, plaintiff, Ulviche Ngayino, hereby demands judgment against the defendant, John Doe, for compensatory damages, attorney's fees, interest, costs of suit.

Dated: March 13, 2017


JOHN J. SHEPTOCK
Attorney for Plaintiff


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JURY DEMAND

Plaintiff hereby demands trial by jury.


Dated: March 13, 2017


JOHN J. SHEPTOCK
Attorney for Plaintiff

CERTIFICATION REQUIRED BY RULE 4:5-1

The undersigned hereby certifies upon information and belief that the matter in controversy is not subject to any other action pending in any court or arbitration proceeding. There is no other action or arbitration proceeding contemplated and there are no other parties who should be joined in this action.

Dated: March 13, 2017


JOHN J. SHEPTOCK
Attorney for Plaintiff

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JOHN J. SHEPTOCK, L L C
2424 Morris Avenue, Suite 302
Union, New Jersey 07083
(908) 686-9800

Attorney for Plaintiff

ULVICHE NGAYINO,

Plaintiffs,

vs.

WILLIAM PAUL, QUALITY CARRIERS,
and JOHN DOE,

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - ESSEX COUNTY
DOCKET NO. ESX-L-1969-17
CIVIL ACTION

SUMMONS

From The State of New Jersey to the Defendant(s) Named Above:

WILLIAM PAUL

The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it. (A directory of the addresses of each deputy clerk of the Superior Court is available in the Civil Division Management Office in the county listed above and online at http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf.) If the complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, P.O. Box 971, Trenton, NJ 08625-0971. A filing fee payable to the Treasurer, State of New Jersey and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your answer or motion to plaintiff's attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee of \$175.00 and completed Case Information Statement) if you want the court to hear your defense.

If you do not file and serve a written answer or motion within 35 days, the court may enter a judgment against you for the relief plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment.

If you cannot afford an attorney, you may call the Legal Services office in the county where you live or the Legal Services of New Jersey Statewide Hotline at 1-888-LSNJ-LAW (1-888-576-5529). If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A directory with contact information for local Legal Services Offices and Lawyer Referral Services is available in the Civil Division Management Office in the county listed above and online at http://www.judicimy.state.nj.us/prosell0153_deptyclerklawref.pdf.

DATED: April 7, 2017

/s/ Michelle M. Smith
MICHELLE M. SMITH
Clerk of the Superior Court

Name of Defendant to Be Served:
Address of Defendant to Be Served:

WILLIAM PAUL
1427 Boardman Street
Sheffield, MA 01257

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JOHN J. SHEPTOCK, L L C
 2424 Morris Avenue, Suite 302
 Union, New Jersey 07083
 (908) 686-9800

Attorney for Plaintiff

ULVICHE NGAYINO,

Plaintiffs,

vs.

WILLIAM PAUL, QUALITY CARRIERS,
 and JOHN DOE,

Defendants.

SUPERIOR COURT OF NEW JERSEY
 LAW DIVISION – ESSEX COUNTY
 DOCKET NO. ESX-L-1969-17
 CIVIL ACTION

SUMMONS

From The State of New Jersey to the Defendant(s) Named Above:

QUALITY CARRIERS

The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it. (A directory of the addresses of each deputy clerk of the Superior Court is available in the Civil Division Management Office in the county listed above and online at http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf.) If the complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, P.O. Box 971, Trenton, NJ 08625-0971. A filing fee payable to the Treasurer, State of New Jersey and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your answer or motion to plaintiff's attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee of \$175.00 and completed Case Information Statement) if you want the court to hear your defense.

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DATED: April 7, 2017

/s/ Michelle M. Smith
 MICHELLE M. SMITH
 Clerk of the Superior Court

Name of Defendant to Be Served:
 Address of Defendant to Be Served:

QUALITY CARRIERS
 4041 Park Oakes Blvd., Suite 200
 Tampa, FL 33610

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JOHN J. SHEPTOCK, LLC
ATTORNEY AT LAW

JOHN J. SHEPTOCK, ESQ.

BRITTNEY L. GRIEVES, ESQ.

2424 Morris Avenue - Suite 302
Union, N.J. 07083

Phone: 908-686-9800
Fax: 908-686-8866
E-mail: atty@mr-john.com

April 7, 2017

VIA FACSIMILE: 866-682-8972

Mr. Jose Salcedo
Zurich
P.O. Box 968072
Schaumburg, IL 60196

RE: Ulviche Ngayino
Claim No.: 4720100860
Date of Accident: 06/25/15
Our File No.: 8788

Dear Mr. Salcedo:

Please find enclosed the following documentation:

1. Filed Complaint
2. Summons for William Paul
3. Summons for Quality Carriers

Once I am in receipt of the Proof of Service, I shall forward a copy to you.

Thank you.

Very truly yours,



JOHN J. SHEPTOCK

/alb

Enclosure

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ESSEX COUNTY - CIVIL DIVISION
SUPERIOR COURT OF NJ
465 MARTIN LUTHER KING JR BLVD
NEWARK NJ 07102

COURT TELEPHONE NO. (973) 776-9300
COURT HOURS 8:30 AM - 4:30 PM

TRACK ASSIGNMENT NOTICE

DATE: MARCH 20, 2017
RE: NGAYINO VS PAUL
DOCKET: ESX L-001969 17

THE ABOVE CASE HAS BEEN ASSIGNED TO: TRACK 2.

DISCOVERY IS 300 DAYS AND RUNS FROM THE FIRST ANSWER OR 90 DAYS
FROM SERVICE ON THE FIRST DEFENDANT, WHICHEVER COMES FIRST.

THE PRETRIAL JUDGE ASSIGNED IS: HON GARRY J. FURNARI

IF YOU HAVE ANY QUESTIONS, CONTACT TEAM 002
AT: (973) 776-9300.

IF YOU BELIEVE THAT THE TRACK IS INAPPROPRIATE YOU MUST FILE A
CERTIFICATION OF GOOD CAUSE WITHIN 30 DAYS OF THE FILING OF YOUR PLEADING.
PLAINTIFF MUST SERVE COPIES OF THIS FORM ON ALL OTHER PARTIES IN ACCORDANCE
WITH R.4:5A-2.

ATTENTION:

ULVICHE NGAYINO

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JTMJTB3

C/K

